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October 6, 2023

Application GRANTED. By November 6, 2023, the parties shall file either proof of termination of this action or a joint letter updating the Court on the status of their efforts to settle.

VIA ECF

SO ORDERED.

Honorable Jennifer H. Rearden
United States District Judge
Southern District of New York
500 Pearl Street, Room 1010
New York, NY 10007

Jennifer H. Rearden, U.S.D.J.
Date: Oct. 17, 2023

Re: *Building Service 32BJ Health Fund, et. al. v. S.J. Services, Inc.*,
1:22-cv-09154 (JHR)

Dear Judge Rearden:

Counsel for the Defendant¹ and the Plaintiffs² write jointly to report that the Parties have reached a settlement in principle and to request a thirty (30) day stay of case deadlines in order to finalize the settlement agreement.

By way of brief background, the Parties have been engaged in settlement discussions with the aid of the Court-Facilitated Mediation and Mediator Paul Huck, since their first mediation session in April 26, 2023. These settlement/mediation discussions continue to date. The Parties have reached a settlement in principle, are actively working on finalizing the terms of the settlement agreement, and expect that the settlement agreement will be finalized in short order. Mediator Huck continues to assist the Parties in seeking this resolution.

In light of the status of settlement, the Parties jointly and respectfully request that the Court grant a thirty (30) day stay of all case deadlines so as to permit the Parties the time to finalize the settlement. If the Court prefers, the Parties are happy to provide a status report by November 6, 2023.

We thank the Court for its time and consideration.

¹ S.J. Services, Inc.

² The Building Service 32BJ Health Fund, Building Service 32BJ Legal Services Fund, Building Service 32BJ Thomas Shortman Training, Scholarship and Safety Fund, SEIU Local 32BJ Connecticut District Pension Fund, Massachusetts Service Employees Pension Fund, Service Employees New England Property Services Training Fund, Maintenance Contractor Trust Fund, and New England Joint LM Trust Fund (collectively, "the Funds").



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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Timothy J. Buckley (on behalf of all Parties and with permission from Plaintiffs' counsel)

Timothy J. Buckley

cc: Robert A. Fisher (via ECF)
Howard M. Wexler (via ECF)
Ira Sturm (via ECF)
Maura Breen (via ECF)